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**Office of The Ombudsman, Hong Kong**

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# Direct Investigation Report

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# Mechanisms for Verifying Travel Records of Comprehensive Social Security Assistance/Social Security Allowance Applicants and Recipients

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# Executive Summary
# Direct Investigation Report

## Mechanisms for Verifying Travel Records of Comprehensive Social Security Assistance/Social Security Allowance Applicants and Recipients

### Introduction

To qualify for assistance or allowance under the Comprehensive Social Security Assistance ("CSSA") Scheme and Social Security Allowance ("SSA") Scheme, applicants must satisfy the prescribed eligibility criteria, including the residence requirements. After approval of applications, CSSA recipients and SSA recipients (excluding those receiving allowance under the Guangdong Scheme and Fujian Scheme) (collectively referred to as "SSA recipients") must reside in Hong Kong during receipt of the assistance/allowance, with the number of days of their absence from Hong Kong not exceeding the permissible limits ("absence limits"). The Social Welfare Department ("SWD") has established mechanisms to verify that CSSA and SSA applicants and recipients (collectively referred to as "CSSA/SSA applicants and recipients") satisfy the relevant residence requirements or absence limits. During our investigation of individual complaint cases, we found that there might be inadequacies in the relevant mechanism. Hence, The Ombudsman initiated a direct investigation against SWD.

### Our Findings

2. Regarding SWD's mechanisms for verifying the travel records of CSSA/SSA applicants and recipients, our findings and comments are as follows.

#### *I. Inadequacies in Regular Data Matching*

3. In early 1990, SWD began to establish a mechanism with the Immigration Department ("ImmD") to cross-check the travel records of SSA applicants and CSSA/SSA recipients, thereby verifying that they satisfy the residence requirement or absence limits. Under that mechanism, at the end of every month, SWD provides ImmD with the Hong Kong Identity Card ("HKIC") numbers of SSA applicants and CSSA/SSA recipients for ImmD to conduct data matching ("Regular Data Matching"). The computerised database of ImmD retains travel records for ten years. After completion of data matching, ImmD will revert to SWD at the beginning of the following month with the travel records of the persons concerned who cleared immigration with their HKICs. Based on those records, SWD verifies whether the persons concerned satisfy the relevant residence requirement or absence limits.

4. Since Regular Data Matching is conducted using only the HKIC numbers of the persons concerned, it is unable to obtain their accurate travel records through Regular Data Matching if those persons used travel documents other than the HKIC to exit and/or enter the territory. Consequently, it is unable to ascertain that the persons concerned indeed satisfy the residence requirement or absence limits.

5. We consider that in the past, outbound travelling was not so prevalent among Hong Kong residents, and only a minority of SSA applicants and CSSA/SSA recipients were holding identification or travel documents other than the HKIC. As a result, at the time when Regular Data Matching was introduced, it probably provided an effective and accurate means to verify the travel records of the persons concerned. Nevertheless, as the times and social circumstances change, there is a much higher chance now than before that SSA applicants and CSSA/SSA recipients will use identification or travel documents other than the HKIC to enter and exit Hong Kong. It is no longer possible to accurately verify the travel records of all SSA applicants and CSSA/SSA recipients through Regular Data Matching.

6. During the course of this direct investigation, we pointed out to SWD that the existing procedures of Regular Data Matching should be improved. SWD responded positively and has started enhancing Regular Data Matching since January 2020. The scope of Regular Data Matching is now extended to cover the travel documents issued by ImmD, making the coverage of travel records considerably more extensive. The scope will be further extended to cover the travel documents issued by other countries/territories.

### *II. Practice Proper in Not Covering CSSA Applicants under Regular Data Matching*

7. Only SSA applicants and CSSA/SSA recipients are subject to Regular Data Matching, while CSSA applicants are not covered. SWD explained that it is because most CSSA applicants can satisfy the relevant residence requirement (i.e. having resided in Hong Kong for at least one year since acquiring the Hong Kong resident status to the date prior to the date of application). Moreover, even after conducting Regular Data Matching on CSSA applicants, ImmD may not be able to provide their complete travel records for confirming whether they satisfy the residence requirement. Considering SWD's justifications and that the computerised database of ImmD only retains travel records for ten years, we accept SWD's explanation. We note that in addition to Regular Data Matching, SWD has also established a manual mechanism with ImmD, under which SWD can use where necessary a specific memorandum to obtain, for verification purpose, the detailed travel records of the persons concerned from ImmD on a case-by-case basis (including those cases of CSSA applicants who cannot produce any documents to prove that they satisfy the residence requirement). We consider that the current practice can largely strike a balance between verifying the eligibility of CSSA applicants in terms of the residence requirement, and offering them timely assistance to meet the basic needs of their lives.

## Recommendation

8. In the light of the above, The Ombudsman recommends that SWD complete all the enhancements to Regular Data Matching as soon as possible, thereby improving the inadequacies in existing procedures.

**Office of The Ombudsman**
**January 2020**

# 1

# INTRODUCTION

## BACKGROUND

**1.1** The Social Welfare Department ("SWD") is responsible for administering the Comprehensive Social Security Assistance ("CSSA") Scheme and the Social Security Allowance ("SSA")[1] Scheme. To qualify for the assistance/allowance, CSSA and SSA applicants must satisfy the prescribed eligibility criteria, including the residence requirements. After approval of applications, CSSA recipients and SSA recipients (excluding those receiving allowance under the Guangdong Scheme and Fujian Scheme) (collectively referred to as "SSA recipients") must reside in Hong Kong during receipt of the assistance/allowance, with the number of days of their absence from Hong Kong not exceeding the permissible limits ("absence limits").

**1.2** SWD has established mechanisms to verify that CSSA and SSA applicants and recipients (collectively referred to as "CSSA/SSA applicants and recipients") satisfy the relevant residence requirements or absence limits. Nevertheless, during our investigation of individual complaint cases, we found that there might be inadequacies in the relevant mechanism as SWD could not obtain the accurate travel records of CSSA/SSA applicants and recipients in certain circumstances. Consequently, it was unable to ascertain that the persons concerned indeed satisfy the residence requirements or absence limits.

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[1] The SSA Scheme comprises Normal Disability Allowance, Higher Disability Allowance, Old Age Allowance, Normal Old Age Living Allowance, Higher Old Age Living Allowance, Guangdong Scheme and Fujian Scheme.

**1.3** Against this background, on 20 September 2019, The Ombudsman initiated a direct investigation against SWD on this subject pursuant to section 7(1)(a)(ii) of The Ombudsman Ordinance to examine whether there are inadequacies on the part of SWD in verifying the travel records of CSSA/SSA applicants and recipients, and any room for improvement.

## PROCESS OF INVESTIGATION

**1.4** On 6 December 2019, we issued a draft investigation report to SWD for comments. This final report, incorporating the Department's comments, was completed on 17 January 2020.

# 2

# RESIDENCE REQUIREMENTS FOR APPLICANTS AND ABSENCE LIMITS FOR RECIPIENTS

## RESIDENCE REQUIREMENTS FOR APPLICANTS

**2.1** To qualify for the assistance or allowance, CSSA and SSA applicants must satisfy the prescribed eligibility criteria, including the residence requirements.

### *Residence Requirement for CSSA Applicants*[2]

**2.2** CSSA applicants must be Hong Kong residents and have held the Hong Kong resident status for not less than one year. They must also satisfy the following residence requirement:

> Having resided in Hong Kong for at least one year since acquiring the Hong Kong resident status to the date prior to the date of application. Absence from Hong Kong for not

[2] In exceptional circumstances, assistance may be granted at the discretion of the Director of Social Welfare ("DSW") to a CSSA applicant who does not satisfy the residence requirement. Moreover, Hong Kong residents aged below 18 are exempted from the two requirements of "having held the Hong Kong resident status for not less than one year" and "having resided in Hong Kong for at least one year".

more than 56 days (whether continuous or intermittent) before the date of application is treated as meeting the one-year residence requirement[3].

### *Residence Requirement for SSA Applicants*[4]

**2.3** SSA applicants must have been Hong Kong residents for at least seven years and satisfy the following residence requirement:

> Having resided in Hong Kong continuously for at least one year immediately before the date of application. Absence from Hong Kong for not more than 56 days (whether continuous or intermittent) during the one-year period is treated as meeting the one-year continuous residence requirement.

## ABSENCE LIMITS DURING RECEIPT OF CSSA/SSA

### *Absence Limits for CSSA Recipients*

**2.4** Generally, in each payment year (from 1 July to 30 June of the following year), a CSSA recipient's total number of days of absence from Hong Kong must not exceed the permissible limit as follows[5]:

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[3] In other words, CSSA applicants must have resided in Hong Kong for at least 309 days.

[4] Consideration can be given to disregarding an SSA applicant's absence from Hong Kong arising from full-time study (for Disability Allowance applicants only) or paid employment outside Hong Kong during the one-year period immediately before the date of application, subject to documentary proof. Moreover, for applicants in need of medical treatment outside Hong Kong because of illness, DSW can exercise discretion to disregard their absence from Hong Kong, given that they can provide sufficient reasons and documentary proof of their condition. Further, Hong Kong residents aged below 18 applying for Disability Allowance are exempted from the two requirements of "having been Hong Kong residents for at least seven years" and "having resided in Hong Kong continuously for at least one year".

[5] Consideration can be given to disregarding a CSSA recipient's absence from Hong Kong arising from paid employment outside Hong Kong, subject to documentary proof that his/her earnings and working hours per month are not less than the prescribed levels set by SWD. Moreover, for those recipients in other categories who have special reasons to be absent from Hong Kong for more than 60 days in a payment

(1) recipients who are old or medically certified to be disabled: 180 days a year; and

(2) recipients in other categories: 60 days a year.

Recipients whose total number of days of absence from Hong Kong, after verification, exceeds the above limits will have their assistance deducted according to the number of days in excess of the limits[6].

### *Absence Limit for SSA Recipients*

**2.5** Generally, in each payment year (the 12-month period from the date when a recipient meets the eligibility criteria for receiving the allowance), an SSA recipient's permissible limit of absence from Hong Kong is 305 days (or 306 days in a leap year)[7]. Recipients whose absence from Hong Kong exceeds the number of days specified above will not be entitled to any allowance under the absence limit. They will receive allowance only for the periods during which they have actually resided in Hong Kong in that payment year[8].

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year, DSW can exercise discretion to extend the absence limit to a maximum of 90 days.

6 For example, an elderly recipient (entitled to an absence limit of 180 days per year) who has been absent from Hong Kong for a total of 181 days in a payment year will have his/her assistance deducted by one day.

7 Consideration can be given to disregarding an SSA recipient's absence from Hong Kong arising from paid employment outside Hong Kong, subject to documentary proof. Moreover, consideration can also be given to disregarding a Disability Allowance recipient's absence from Hong Kong arising from full-time study outside Hong Kong, subject to documentary proof.

8 For example, a recipient who has resided in Hong Kong for 34 days in a payment year will only receive the allowance for 34 days.

# 3

# EXISTING MECHANISMS AND PROCEDURES FOR VERIFYING RESIDENCE REQUIREMENTS AND ABSENCE LIMITS

## MECHANISMS BETWEEN SWD AND IMMIGRATION DEPARTMENT FOR CROSS-CHECKING TRAVEL RECORDS

**3.1** SWD has established the following mechanisms with the Immigration Department ("ImmD") for verifying that CSSA/SSA applicants and recipients satisfy the residence requirements or absence limits (see **paras. 2.2-2.5**).

### *Regular Data Matching*

**3.2** In early 1990, SWD began to establish a mechanism with ImmD for cross-checking travel records. Under that mechanism, at the end of every month, SWD provides ImmD with the Hong Kong Identity Card ("HKIC") numbers of SSA applicants and CSSA/SSA recipients for ImmD to conduct data matching ("Regular Data Matching"). CSSA applicants are not covered under Regular Data

Matching. The computerised database of ImmD retains travel records for ten years. After completion of data matching, ImmD will revert to SWD at the beginning of the following month with the travel records of the persons concerned who cleared immigration with their HKICs. Based on those records, SWD verifies whether the persons concerned satisfy the relevant residence requirement or absence limits.

**Table**

| **Relevant Persons** | **Subject to Regular Data Matching** |
|---|---|
| CSSA applicants | ✘ |
| SSA applicants | ✓ |
| CSSA recipients | ✓ |
| SSA recipients | ✓ |

### *Memorandum Procedure*

**3.3** In addition to the aforesaid Regular Data Matching, SWD has also established a manual mechanism with ImmD, under which SWD can use where necessary a specific memorandum to obtain the detailed travel records of the persons concerned from ImmD on a case-by-case basis, thereby verifying that they satisfy the relevant residence requirements or absence limits ("Memorandum Procedure").

## SWD'S PROCEDURES FOR VERIFYING TRAVEL RECORDS OF CSSA/SSA APPLICANTS AND RECIPIENTS

### *CSSA Applicants*

**3.4** CSSA applicants must satisfy the requirement of having

resided in Hong Kong for at least one year[9] (see **para. 2.2 and note 3**). Applicants are required to declare in the application form whether they have resided in Hong Kong for at least 309 days since acquiring the Hong Kong resident status to the date prior to the date of application. SWD officers will verify that they satisfy the residence requirements by conducting home visits or office interviews, during which they will check the applicants' travel documents, ask questions to learn more about their absence from Hong Kong during the relevant period, and review documentary proof related to their residence in Hong Kong (for instance, whether the applicants can produce evidence that they have been studying or working in Hong Kong for more than one year). For individual cases without any documentary proof, SWD will obtain the detailed travel records of the persons concerned from ImmD through the Memorandum Procedure (see **para. 3.3**).

**3.5** SWD explained to us that most CSSA applicants (including those aged 18 or above who were born in Hong Kong or have held the Hong Kong resident status for years) can satisfy the residence requirement (see **para. 2.2**). Therefore, SWD found it unnecessary to verify that the applicants satisfy the residence requirement through Regular Data Matching (see **para. 3.2 and Table**). Moreover, even after conducting Regular Data Matching, ImmD may not be able to provide the complete travel records of CSSA applicants since their acquiring the Hong Kong resident status. For individual cases of CSSA applicants who cannot produce any proof that they satisfy the residence requirement, SWD will obtain their detailed travel records from ImmD through the Memorandum Procedure (see **para. 3.3**), thereby verifying whether they satisfy the residence requirement. SWD remarked that the CSSA Scheme provides the last safety net for members of the public. Applicants are generally suffering from financial hardship due to old age, disability, illness or unemployment. It is essential to process their applications as quickly as possible, such that assistance can be

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9 In cases of application for CSSA on a household basis, the applicants and their family members must satisfy the requirement of having resided in Hong Kong for at least one year. Therefore, an applicant is required to declare concurrently in the application form for his/her family members whether they have resided in Hong Kong for at least 309 days since acquiring the Hong Kong resident status to the date prior to the date of application. SWD will also verify that the applicant's family members satisfy this requirement.

offered to them for meeting the basic needs of their lives. Hence, SWD considered the existing mechanism to have struck a proper balance between optimising the use of public resources and providing assistance to eligible individuals in financial difficulties.

### *SSA Applicants*

**3.6** SSA applicants must satisfy the requirement of having resided continuously in Hong Kong for at least one year immediately before the date of application (see **para. 2.3**). Applicants for different types of allowance are required to give details in the application form about the days of their absence from Hong Kong during the year immediately before the date of application. In particular, applicants for Normal Disability Allowance, Higher Disability Allowance, Old Age Allowance, Normal Old Age Living Allowance and Higher Old Age Living Allowance should attach with their application forms a copy of travel document pages showing their outbound travel records during the one-year period immediately before the date of application and personal data. As for applicants under the Guangdong Scheme and Fujian Scheme, when attending the appointment with the Social Security Field Unit (Guangdong Scheme and Fujian Scheme) of SWD to complete the application procedures in person, they should bring along the original copy of all their travel documents for inspection by SWD officers, who will make a preliminary assessment as to whether they satisfy the residence requirements.

**3.7** Meanwhile, the travel records of SSA applicants during the year immediately before the date of application are cross-checked by SWD through Regular Data Matching (see **para. 3.2**). Where the matching results show that as at the date of application an applicant did not satisfy the requirement of having resided in Hong Kong continuously for at least one year (i.e. having been absent from Hong Kong for more than 56 days during the one-year period), SWD's computer system will calculate a "proposed qualifying date"[10] for the applicant, assuming that he/she has not exited Hong Kong since the date of application. SWD will then issue letters to

[10] Assuming that the applicant has not exited Hong Kong since the date of application, the "proposed qualifying date" will be upon expiry of a period equal to the number of days of his/her absence from Hong Kong in excess of the 56-day limit.

the applicant concerned in accordance with the following circumstances:

(1) In the case that the “proposed qualifying date” falls within the period covered by the next round of Regular Date Matching, the applicant will be informed of the “proposed qualifying date” in writing, and will be further issued a notification of application result after his/her travel records during that period are cross-checked again by SWD in the next round of Regular Data Matching;

(2) In the case that the “proposed qualifying date” falls after the period covered by the next round of Regular Date Matching, the applicant will be informed of the “proposed qualifying date” in writing, and advised to submit a fresh application on or after that date. The applicant will also be informed that if disagreeing with the matching results, he/she should contact SWD within a specified period. SWD will close the application case after that specified period.

**3.8** Applicants who disagree with the data matching results can provide SWD with supplementary information (such as transport tickets or package tour receipts showing their names and the dates on which they re-entered Hong Kong). If the applicants cannot produce any documentary proof, SWD will obtain their detailed travel records from ImmD through the Memorandum Procedure (see **para. 3.3**), thereby further verifying whether they satisfy the residence requirement.

### *CSSA and SSA Recipients*

**3.9** In each payment year, CSSA and SSA recipients are subject to the prescribed absence limits. Absence from Hong Kong exceeding the absence limits will affect their entitlements (see **paras. 2.4 and 2.5**). SWD verifies the travel records of CSSA/SSA recipients in the past one month through Regular Data Matching

(see **para. 3.2**). Where a CSSA/SSA recipient has been absent from Hong Kong for a period longer than the absence limit during receipt of the assistance/allowance, SWD's computer system will automatically issue a notification letter (not applicable to CSSA cases on a household basis[11]), inviting the recipient to contact the case officer to make clarification within seven days. If the recipient does not contact the case officer within seven days, the payment of his/her assistance/allowance will be suspended after 14 days.

**3.10** CSSA/SSA recipients who disagree with the data matching results can provide SWD with supplementary information to prove the days of their absence from Hong Kong. If the CSSA/SSA recipients cannot produce any documentary proof, SWD will obtain their detailed travel records from ImmD through the Memorandum Procedure (see **para. 3.3**), thereby further verifying whether they exceed the absence limits.

**3.11** SWD explained to us that if SSA applicants and CSSA/SSA recipients are discovered by SWD to be not satisfying the residence requirement or absence limits after their travel data are cross-checked with ImmD through Regular Data Matching such that SWD has to take adverse action against them (such as terminating the processing of application, rejecting or suspending the payment of assistance/allowance), SWD will first inform the persons concerned and allow those disagreeing with the matching results to provide supplementary information for proving the number of days of their residence in/absence from Hong Kong. Only after they fail to produce any proof will SWD carry out further verification with ImmD through the Memorandum Procedure (see **paras. 3.7-3.10**). This is for compliance with the provisions under the Personal Data (Privacy) Ordinance ("PDPO")[12], pursuant to which SWD shall serve

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[11] For CSSA cases on a household basis which have exceeded the absence limits, the case officer will issue a letter inviting the recipient to attend a face-to-face meeting to follow up the case.

[12] It is stipulated in section 30(5) of the PDPO that:
… a data user shall not take adverse action against an individual in consequence (whether in whole or in part) of the carrying out of a matching procedure—

(a) unless the data user has served a notice in writing on the individual—
(i) specifying the adverse action it proposes to take and the reasons therefor; and
(ii) stating that the individual has 7 days after the receipt of the notice within

a notice in writing for the individual to have seven days to show cause why adverse action should not be taken.  SWD considered that in first giving SSA applicants and CSSA/SSA recipients a chance to clarify and provide supplementary information regarding their incomplete travel records, it not only can comply with the statutory requirements under the PDPO, but also can reduce the inconvenience caused to the persons concerned.  Once the SSA applicants and CSSA/SSA recipients provide adequate supplementary information to clarify the incomplete travel records, SWD can update its computerised records, adjust the amount of assistance/allowance and make instant approval.  This will help the persons concerned receive payments more quickly, as the processing time can be shorter than that required under the Memorandum Procedure.

## APPEAL MECHANISM

**3.12** Where CSSA/SSA applicants and recipients disagree with SWD's decisions to stop processing their applications, or to deduct or suspend the payment of assistance/allowance on the grounds that they do not satisfy the residence requirements or absence limits, they can lodge an appeal to the Social Security Appeal Board within four weeks from the date of the letter issued by SWD notifying them of its decisions.

**3.13** During the period from 2014 to 2018, there were two to six appeal cases each year in relation to the residence requirements or absence limits under the CSSA/SSA Schemes.  All the appeal cases were unsuccessful.

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which to show cause why that action should not be taken; and

(b) until the expiration of those 7 days.

# 4

# *OUR COMMENTS AND RECOMMENDATION*

**4.1** SWD has prescribed the residence requirements and absence limits (see **Chapter 2**) as the eligibility criteria for CSSA/SSA applicants and recipients[13]. Having examined the existing mechanisms and procedures for verifying the residence requirements applicable to CSSA and SSA applicants, and the absence limits applicable to CSSA and SSA recipients, we have the following comments.

## I. INADEQUACIES IN REGULAR DATA MATCHING

**4.2** Since early 1990, SWD has established the procedure of Regular Data Matching with ImmD, under which the HKIC numbers of SSA applicants and CSSA/SSA recipients are used to cross-check their travel records, thereby verifying that they satisfy the relevant residence requirement or absence limits (see **para. 3.2**).

**4.3** Since Regular Data Matching is conducted using only the HKIC numbers of the persons concerned, it is unable to obtain their accurate travel records if those persons used travel documents other than the HKIC (including travel documents issued by ImmD or other countries/territories) to exit and/or enter the territory.

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[13] According to information from SWD's website, during the six months from April to September 2019, the numbers of CSSA applicants and SSA applicants were some 18,000 and 57,000 respectively. Moreover, as at 30 September 2019, the numbers of CSSA recipients and SSA recipients (excluding those receiving allowance under the Guangdong Scheme and Fujian Scheme) were some 220,000 and 960,000 respectively.

**4.4** In fact, we received a complaint from an applicant for the Old Age Allowance under the SSA Scheme (see **note 1**). The complainant had been absent from Hong Kong for just several days during the one-year period immediately before the date of application. However, SWD alleged that she did not satisfy the requirement of continuous residence in Hong Kong for at least one year (see **para. 2.3**). It turned out that she had used the HKIC to clear immigration when exiting Hong Kong, but used another travel document when re-entering. Consequently, the results of Regular Data Matching only revealed her exit record, but not the entry one. After she submitted the relevant entry record, SWD approved her application and disbursed the allowance to her. As shown in the above case, if those SSA applicants or CSSA/SSA recipients use travel documents other than the HKIC to exit or enter the territory, the results from Regular Data Matching will not reveal their actual number of days of absence from Hong Kong. Consequently, it is unable to ascertain that the persons concerned indeed satisfy the residence requirement or absence limits.

**4.5** We consider that in the past, outbound travelling was not so prevalent among Hong Kong residents, and only a minority of SSA applicants and CSSA/SSA recipients were holding identification or travel documents other than the HKIC. As a result, at the time when Regular Data Matching was introduced, it probably provided an effective and accurate means to verify the travel records of the persons concerned. Nevertheless, following the change in times and social circumstances, there is a much higher chance now than before that SSA applicants and CSSA/SSA recipients will use identification or travel documents other than the HKIC to enter and exit Hong Kong. It is no longer possible to accurately verify the travel records of all SSA applicants and CSSA/SSA recipients through Regular Data Matching.

**4.6** During the course of this direct investigation, we pointed out to SWD that the existing procedures of Regular Data Matching should be improved. SWD responded positively and has started enhancing Regular Data Matching since January 2020. The scope

of Regular Data Matching is now extended to cover the travel documents issued by ImmD, making the coverage of travel records considerably more extensive. The scope will be further extended to cover the travel documents issued by other countries/territories.

## II. PRACTICE PROPER IN NOT COVERING CSSA APPLICANTS UNDER REGULAR DATA MATCHING

**4.7** Only SSA applicants and CSSA/SSA recipients are subject to Regular Data Matching (see **Table** under **para. 3.2**).

**4.8** As explained by SWD, CSSA applicants are not covered under Regular Data Matching because most CSSA applicants can satisfy the one-year residence requirement (see **para. 2.2**). Moreover, even after conducting Regular Data Matching on CSSA applicants, ImmD may not be able to provide their complete travel records for confirming whether they satisfy the residence requirement (see **para. 3.5**). Considering SWD's justifications and that the computerised database of ImmD only retains travel records for ten years, we accept SWD's explanation. We note that for individual cases of CSSA applicants who cannot produce any proof that they satisfy the residence requirement, SWD will obtain, for verification purpose, their detailed travel records from ImmD through the Memorandum Procedure (see **para. 3.3**). We consider that the current practice can largely strike a balance between verifying the eligibility of CSSA applicants in terms of the residence requirement, and offering them timely assistance to meet the basic needs of their lives.

## OUR RECOMMENDATION

**4.9** In the light of the above, The Ombudsman recommends that SWD complete all the enhancements to Regular Data Matching as soon as possible, thereby improving the inadequacies in existing procedures.

**ACKNOWLEDGEMENTS**

**4.10** The Ombudsman thanks SWD for its full cooperation in the course of this investigation.

**Office of The Ombudsman**
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